D.1 Introduction to Environmental Analysis

This section explains the organization and purpose of each part of Section D.

D.1.1 Organization of Each Section

Section D of this EIS examines the environmental consequences associated with the Proposed Project and the alternatives to it. Section D includes analyses of the 20 environmental disciplines listed below:

D.2 Agriculture
D.3 Air Quality
D.4 Biological Resources: Vegetation
D.5 Biological Resources: Wildlife
D.6 Climate Change
D.7 Cultural Resources
D.8 Socioeconomics and Environmental Justice
D.9 Geology and Soils
D.10 Hazards and Hazardous Materials
D.11 Land Use and BLM Realty
D.12 Mineral Resources
D.13 Noise
D.14 Paleontological Resources
D.15 Recreation
D.16 Transportation and Traffic
D.17 Utilities and Public Services
D.18 Visual Resources
D.19 Water Resources and Hydrology
D.20 Wildland Fire
D.21 Electrical Interference and Safety

Within each environmental discipline, discussions are presented in the following order:

- Environmental Setting / Affected Environment
- Applicable Regulations, Plans, and Standards
- Environmental Impacts of the Proposed Project (including Connected Actions)
- Environmental Impacts of Project Alternatives
- Environmental Impacts of No Action Alternatives (Options 1 and 2)
- Mitigation Monitoring, Compliance, and Reporting
- References

By identifying the impacts associated with each environmental discipline and the offsetting mitigation measures, the regulatory agencies and the general public are offered a discussion and full disclosure of the severity of environmental impacts of this Proposed Project and its alternatives, including the No Action Alternative.

Analysis sections in BLM EIS documents typically include Grazing and consideration of impacts on Wild Horse and Burros. These sections are not addressed in this EIS because there is no grazing on the affected BLM-managed lands, and there are no wild horses or burros.

Cumulative impacts for all disciplines are presented in Section E, and other NEPA analysis requirements are addressed in Section F.

D.1.2 Alternatives

As explained in Section C (Alternatives) and in more detail in Appendix 5 (Alternatives Screening Report), the following alternatives are evaluated in each section:

- Tower Relocation Alternative
- Iowa Street 66 kV Underground Alternative
- Phased Build Alternative
- No Action Alternative

The impacts of the alternatives are described in each analysis section in Section D, and the overall impacts of the alternatives are compared in Section G (Comparison of Alternatives) of this EIS.

D.1.3 NEPA Requirements

NEPA strives to facilitate informed governmental decisions regarding projects and operations that may affect the environment.

The methodology used in this EIS conforms to the guidance found in the Council on Environmental Quality (CEQ) regulations for implementing NEPA — methodology and scientific accuracy (40 CFR 1502.24), cumulative impact (40 CFR 1508.7), and effects (40 CFR 1508.8). In addition, guidance from the BLM NEPA Handbook (H-1790-1) was followed.

The CEQ NEPA regulations use the terms "effects" and "impacts" synonymously. Under NEPA, the environmental consequences section of an EIS must discuss direct and indirect impacts of the proposed project (40 CFR 1502.16[a]-[b]). The regulations define "effects" as "direct effects, which are caused by the action and occur at the same time and place" (40 CFR 1508.8[a]). Indirect effects consider effects "later in time or farther removed in distance, but are still reasonably foreseeable" (40 CFR 1508.8[b]). "Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems" (40 CFR 1508.8).

Under NEPA, impacts are addressed in proportion to their significance (40 CFR 1502.2[b]), meaning that severe impacts should be described in more detail than less consequential impacts. The intention is to help decision makers and the public focus on the project's key effects.

D.1.4 Impact Analysis and Mitigation Measures

The analysis completed for each environmental discipline follows the NEPA requirements defined above. In each section, there may be Applicant Proposed Measures (APMs) developed by SCE and/or mitigation measures recommended in this EIS.

D.1.4.1 Applicant Proposed Measures

The Applicant has incorporated a substantial number of measures and procedures to avoid or reduce impacts into the description of its Proposed Project. In the assessment of the impacts, these Applicant Proposed Measures (APMs) have been assumed to be part of the Proposed Project, and therefore are not included as recommended mitigation measures. However, implementation of each APM will be monitored by the BLM and CPUC. The APMs that are intended to reduce the potential impacts in a particular environmental discipline (such as air quality, biology, etc.) are listed in the section addressing that environmental discipline. In some instances, APMs are superseded by mitigation measures that provide greater specificity and direction or include actions omitted in the original APM.

D.1.4.2 Mitigation Measures

Under NEPA, mitigation measures would be considered even for impacts that are not found to be significant. The federal Council on Environmental Quality's (CEQ) *Forty Most Asked Questions Concerning CEQ's NEPA Regulations* (Forty Questions), Question No. 19a asks about the scope of mitigation measures that must be discussed. The response states:

> *The mitigation measures discussed in an EIS must cover the range of impacts of the proposal. The measures must include such things as design alternatives that would decrease pollution emissions, construction impacts, esthetic intrusion, as well as relocation assistance, possible land use controls that could be enacted, and other possible efforts.* ***Mitigation measures must be considered even for impacts that by themselves would not be considered "significant."*** *[emphasis added] Once the proposal itself is considered as a whole to have significant effects, all of its specific effects on the environment (whether or not "significant") must be considered, and mitigation measures must be developed where it is feasible to do so. Sections 1502.14(f), 1502.16(h), 1508.14.*

Because CEQ's NEPA guidelines require a demonstration of reduction of impacts to the maximum extent possible, mitigation measures were identified for all classes of impacts (except beneficial impacts). The mitigation measures recommended by this study have been identified in the impact assessment sections and presented in a Mitigation Monitoring Program table at the end of the analysis for each environmental discipline (also see Section G for discussion of the Mitigation Monitoring Program).

D.1.5 Analysis of Connected Actions

As explained in Section B.7.1, the BLM has defined specific projects that have been found to be so closely related to the Proposed Project as to be considered "connected actions" under the National Environmental Policy Act (NEPA). Projects that are considered "connected actions" under NEPA (40 CFR 1508.25(a)(l)) include actions that cannot proceed unless the proposed action occurs first or simultaneously. Table B-22 describes these projects, and explains why each has been found to be "connected." Within each discipline's analysis in Sections D.2 through D.21, this EIS includes both a description of the environmental setting for the connected actions and analysis of the impacts of these actions. Any mitigation for impacts of a connected project would be imposed on that project by the agency having jurisdiction and would not be the responsibility of SCE under the West of Devers Upgrade Project.

D.1.6 Cumulative Impact Assessment

NEPA requires that cumulative impacts be considered. A "cumulative impact" is the environmental impact resulting from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions that can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7). Cumulative effects are considered in Section E of this EIS. The cumulative impacts of the project taken together with the related cumulative projects (listed in Section E) are assessed, and mitigation measures for each impact were identified, if applicable. The focus in the cumulative impact analysis is to identify those project impacts that might not be significant when considered alone, but contribute to a significant impact when viewed in conjunction with future planned or foreseeable projects.

D.1.7 Other NEPA Requirements

Section F of this EIS presents the analysis required by NEPA for the following topics:

- Indirect effects, including growth-inducing effects (40 CFR 1502.16[b], 1508.8[b])
- Irreversible and irretrievable commitment of resources (40 CFR 1502.16)
- Adverse environmental effects that cannot be avoided should the Proposed Project be implemented (40 CFR 1502.16)

- Relationship between short-term uses and long-term productivity of the environment (40 CFR 1502.16)
- Energy requirements and conservation potential of various alternatives and mitigation measures (40 CFR 1502.16[e]).

Appendix 9 (Policy Screening Report) of this EIS addresses NEPA's requirement to discuss possible conflicts between proposed actions and the objectives of federal, state, local, or tribal land use plans, policies, and controls (40 CFR 1502.16[c]).